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September 14, 2020

BY ECF

The Honorable Analisa Torres
United States District Judge
Daniel P. Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *The New York Times Company et al. v. Department of the Treasury*, 19 Civ. 9669
(AT)

Dear Judge Torres:

I write respectfully on behalf of all parties in the above-referenced action brought under the Freedom of Information Act, 5 U.S.C. § 552 ("FOIA"), to provide the status update ordered by the Court on August 14, 2020, and to request an adjournment of the telephonic conference scheduled for September 23, 2020, at 10:40 AM. *See* Dkt. No. 29 (mem. endorsement).

On August 13, 2020, the parties submitted a joint letter in which they informed the Court that they were continuing to confer about modifications to Plaintiffs' FOIA request that may resolve part or all of this case. Dkt. No. 28. Since the parties submitted that letter, Plaintiffs have completed reviewing a spreadsheet of information provided by the Government. Based on that information, Plaintiffs have provided the Government with a narrowed list of domains that sent email to or received email from specific agency custodians. The parties respectfully request an additional 30 days to continue their efforts to agree on the scope of the Government's review of records. Further, the parties respectfully propose that they submit a joint status letter updating the



Court on their efforts and proposing next steps in this case by October 13, 2020, and that the telephonic conference scheduled for September 23, 2020, be adjourned to a date and time after October 13, 2020, that is convenient for the Court. This is the parties' ninth request for an adjournment of the initial conference. The first eight requests were granted. Dkt. Nos. 14, 16, 19, 21, 23, 25, 27, 29.

I thank the Court for its consideration of these requests.

Respectfully submitted,

By: /s/ Charles Crain

Charles Crain, Supervising attorney
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GRANTED. The initial pretrial conference scheduled for September 23, 2020, is **ADJOURNED to October 22, 2020, at 10:20 a.m.** By **October 15, 2020**, the parties shall submit a joint status letter.

The parties are directed to call (888) 398-2342 or (215) 861-0674, and enter access code 5598827.

SO ORDERED.

Dated: September 15, 2020
New York, New York

A handwritten signature in black ink, appearing to read "Analisa", is positioned above a horizontal line.

ANALISA TORRES
United States District Judge